

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

[illegible]

RESPONSE TO TRUSTEE’S MOTION TO DISMISS

COME NOW Debtors, Russell Holt and Elizabeth Brooks-Holt, by and through Counsel, and for this Response to the Trustee's Motion to Dismiss, state that Debtors have set up payments through TFSBillPay and made their first payment on February 10, 2023. The payment cleared on February 16, 2023 but has not yet posted to the Trustee's site. Counsel has forwarded proof of payment to the Trustee via FileZilla. Therefore, the Trustee's Motion to Dismiss should be denied.

WHEREFORE, Debtors pray the Court for an order denying the Trustee's Motion to Dismiss, and for such other relief as the Court deems equitable and proper.

Dated: February 17, 2023

Respectfully submitted,
WM Law

/s/ Errin P. Stowell

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ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, the foregoing was delivered via e-mail to the parties listed below, and parties that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to the parties listed below that are not registered to receive electronic filings on ECF.

Via the Court's ECF Notice: Richard V. Fink, standing Chapter 13 Trustee

Court Address: U.S. Bankruptcy Court, 400 E. 9th Street, Kansas City, MO 64106.

Dated: February 17, 2023

/s/ Errin P. Stowell